THE HONORABLE RICARDO S. MARTINEZ 1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 11 JENNIFER VIERA, NO. 2:20-cv-00534-RSM 12 Plaintiff, JOINT STIPULATION TO EXTEND INITIAL EXPERT DISCLOSURE 13 VS. DEADLINE AND PROPOSED ORDER STATE FARM MUTUAL AUTOMOBILE **RE SAME** 14 INSURANCE COMPANY, a Foreign NOTED FOR CONSIDERATION: Corporation, 15 **September 30, 2020** Defendant. 16 (Same Day Motion) 17 Without Oral Argument 18 **STIPULATION** 19 COME NOW the parties herein, by and through their attorneys of record, and request the 20 Court enter an Order extending the deadline for "Disclosure of expert testimony under FRCP 21 26(a)(2)" from its current date of October 21, 2020 to November 15, 2020. 22 The primary reasons for the requested continuance are that (1) the soonest that plaintiff 23 has time off from work to submit to a medical examination by defendant's medical expert is 24 25 JOINT STIPULATION TO EXTEND INITIAL EXPERT DISCLOSURE DEADLINE AND PROPOSED ORDER RE

1070.145/Viera C20-634 stip order ext expert ddl

(Case No. 2:20-cv-00534-RSM)

SAME - 1

WAKEFIELD & KIRKPATRICK, PLLC
A T T O R N E Y S A T L A W
17544 MIDVALE AVENUE NORTH, SUITE 307
SHORELINE, WA 98133
(206) 629-2120 FAX (206) 629-2120

1	late October 2020 (the exam is tentatively scheduled for October 27, 2020) and (2) plaintiff's
2	claims-handling expert requires more time to complete his report.
3	DATED this 30 th day of September, 2020.
4	WAKEFIELD & KIRKPATRICK, PLLC
5	
6	Dry a / Day Viulmatui al-
7	By <u>s/Dan Kirkpatrick</u> Dan Kirkpatrick WSBA #38674
8	WAKEFIELD & WAKEFIELD, PLLC 17544 Midvale Ave N, Suite 307
9	Shoreline, WA 98133 T:(206) 629-5489
10	F:(206) 629-2120
	E-mail: dkirkpatrick@wakefieldkirkpatrick.com
11	Attorneys for State Farm
12	PAULEY LAW GROUP, PLLC
13	
14	By <i>s/ Dan Kirkpatrick</i> for Ryan Pauley per email
15	dated September 30, 2020
16	Ryan Pauley WSBA #40625 PAULEY LAW GROUP, PLLC
	1001 4th Ave Ste 3200
17	Seattle, WA 98154 (206) 684-9454
18	rpauley@pauleylawgroup.com
19	Attorneys for Jennifer Viera
20	
21	
22	
23	
24	
25	

JOINT STIPULATION TO EXTEND INITIAL EXPERT DISCLOSURE DEADLINE AND PROPOSED ORDER RE SAME - 2 (Case No. 2:20-cv-00534-RSM)

WAKEFIELD & KIRKPATRICK, PLLC A T T O R N E Y S A T L A W 17544 MIDVALE AVENUE NORTH, SUITE 307 SHORELINE, WA 98133 (206) 629-2120 FAX (206) 629-2120

23

24

25

ORDER

THIS MATTER came on for hearing before the Court on "Joint Stipulation Extend Initial Expert Disclosure Deadline" and the Court, being fully advised in the premises, does hereby

ORDER, ADJUDGE AND DECREE that "Joint Stipulation Extend Initial Expert Disclosure Deadline" is GRANTED and the deadline for "Disclosure of expert testimony under FRCP 26(a)(2)" is moved from its current date of October 21, 2020 to November 15, 2020.

Dated this 30th day of September, 2020.

RICARDO S. MARTINEZ

CHIEF UNITED STATES DISTRICT JUDGE

JOINT STIPULATION TO EXTEND INITIAL EXPERT DISCLOSURE DEADLINE AND PROPOSED ORDER RE SAME - 3

(Case No. 2:20-cv-00534-RSM)

WAKEFIELD & KIRKPATRICK, PLLC ATTORNEYS AT LAW 17544 MIDVALE AVENUE NORTH, SUITE 307 SHORELINE, WA 98133 (206) 629-2120 FAX (206) 629-2120